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APR 6 - 1993

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of ) MM DOCKET NO. 92-244  
 )  
Amendment of Section 73.202(b) ) RM-8027  
Table of Allotments )  
FM Broadcast Stations )  
(Charlotte Amalie, Virgin Islands))

TO: Chief, Allocations Branch  
Policy & Rules Division  
Mass Media Bureau

DOCKET FILE COPY ORIGINAL

SUPPLEMENT TO  
COMMENTS OF ASOCIACION PUERTORRIQUENA DEL ESTE  
DE LOS ADVENTISTAS DEL SEPTIMO DIA

Asociacion Puertorriquena del Este de los Adventistas del Septimo Dia ("WZOL"), by counsel, hereby supplements its Comments filed in the above-identified proceeding on March 4, 1993. Asociacion is the licensee of FM station WZOL, Luquillo, Puerto Rico.

WZOL filed Comments in this proceeding in support of the counterproposal by Paradise Broadcasting Corporation to amend the Table of Allotments so as to delete Channel 222B at Cruz Bay, Virgin Islands from the Table. WZOL operates on Channel 221A at Luquillo and is presently short-spaced to WDCM, Paradise Broadcasting's station on Channel 222B at Cruz Bay. The deletion of Channel 222B would allow WZOL to increase its facilities to maximum Class A 6-kilowatt status.

In support of Paradise Broadcasting's counterproposal, WZOL demonstrated how the public would be better served by allowing WZOL the opportunity to operate with maximum Class A facilities. Central to WZOL's argument was its assertion that

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WZOL would be able to provide an aural service to 809,813 persons as opposed to the 307,833 proposed to be served by WZOL under its presently pending application for authority to move its transmitter site. Thus, adoption of the counterproposal would allow WZOL to provide a new aural service to over 500,000 people.

However, WZOL's statement regarding the potential for service to a much larger population was not addressed in the technical exhibit which accompanied WZOL's Comments. The primary purpose of this Supplement is to provide a technical showing which documents the claim of WZOL's potential for a substantially larger service area population. Attached as Appendix A is a technical exhibit which shows that WZOL would serve an area with a population of 817,838 if operating with

Submitted herewith in Appendix B is the executed affidavit of the consulting engineer covering the technical exhibit originally filed with WZOL's Comments on March 4. An unexecuted copy of the affidavit was filed with the Comments.

Respectfully submitted,

ASOCIACION PUERTORRIQUENA DEL ESTE  
DE LOS ADVENTISTAS DEL SEPTIMO DIA

By:   
Donald E. Martin

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2000 L Street, N.W.  
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Its Attorney

April 6, 1993

## **APPENDIX A**



**MOFFET, LARSON & JOHNSON, INC.**  
CONSULTING TELECOMMUNICATIONS ENGINEERS

Two Skyline Place  
Suite 800

## **ENGINEERING REPORT**

5203 Leesburg Pike  
Falls Church, Virginia 22041

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**Engineering Statement On Behalf of  
Asociacion Puertorriquena del Este de los Adventistas del Septimo Dia  
Licensee of WZOL(FM), Channel 221A, Luquillo, Puerto Rico**

March 12, 1993

Asociacion Puertorriquena del Este de los Adventistas del Septimo Dia  
Luquillo, Puerto Rico

This Engineering Statement was prepared on behalf of Asociacion Puertorriquena del Este de los Adventistas del Septimo Dia, licensee of station WZOL(FM), Channel 221A, Luquillo, Puerto Rico. This statement is a Supplemental Showing to our previous Engineering Statement dated March 4, 1993. The instant statement supports WZOL's comments in the rulemaking proceeding involving WDCM(FM), Channel 222B, Cruz Bay, Virgin Islands, which requests that the Commission substitute Channel 267B for Channel 222B. This frequency change would remove the only restriction to WZOL for operation with maximum Class A facilities.

As a full Class A facility in Puerto Rico, 47 CFR 73.211(b)(3) states that stations located in Puerto Rico and the Virgin Islands have a Class f(50,50) 60 dBu contour distance of 42 kilometers. The proposed WZOL facility has a reference HAAT of 279 meters. Thus, as was stated in the previous engineering, WZOL may operate with a non-directional ERP of 4.6 kilowatts. Using these parameters, contour distances were calculated on radials from 0 to 350 degrees, every 10 degrees of arc with additional radials used at critical azimuths. Attached as Table 1 is a distance to contour study for the proposed site.

The 60 dBu Service Contour created using the above-referenced data will encompass an estimated 817,838<sup>1</sup> persons, a 165.5% increase in population relative to the pending WZOL application for Construction Permit. Thus, if WZOL were allowed a full Class A facility in lieu of its present proposal, a substantial improvement in coverage could be provided.

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<sup>1</sup>Population was determined by block-group centroid retrieval based on 1990 U.S. Census Data.

Asociacion Puertorriquena del Este de los Adventistas del Septimo Dia  
Luquillo, Puerto Rico

Table 1

ATS Propagation Program Rev[ 1.30] - Metric Units  
 FM f(50-50)  
 Site ID : WZOL(FM)

Maximum Effective Radiated Power 4.60 kW 6.63 dBk

Non-Directional Antenna

Antenna Radiation Center: 387. Meters AMSL

Bear Deg True	AE Meters	HAAT Meters	Ant Gain dB	ERP dBk	ERP kW	Distances to Contours (km)	
						70. dBu	60. dBu
0.0	2	385%	0.00	6.63	4.60	29.5	48.1
10.0	2	385%	0.00	6.63	4.60	29.4	48.1
20.0	1	386%	0.00	6.63	4.60	29.5	48.2
30.0	2	385%	0.00	6.63	4.60	29.4	48.1
40.0	1	386%	0.00	6.63	4.60	29.5	48.2
45.0	2	385%	0.00	6.63	4.60	29.4	48.1
50.0	5	382%	0.00	6.63	4.60	29.3	48.0
60.0	15	372%	0.00	6.63	4.60	29.0	47.4
70.0	14	373%	0.00	6.63	4.60	29.0	47.5
80.0	9	378%	0.00	6.63	4.60	29.2	47.8
90.0	6	381%	0.00	6.63	4.60	29.3	47.9
100.0	4	383%	0.00	6.63	4.60	29.4	48.0
110.0	8	379%	0.00	6.63	4.60	29.3	47.8
120.0	14	373%	0.00	6.63	4.60	29.0	47.5
125.0	13	374%	0.00	6.63	4.60	29.1	47.5
130.0	13	374%	0.00	6.63	4.60	29.1	47.5
135.0	17	370%	0.00	6.63	4.60	28.9	47.3
140.0	22	365%	0.00	6.63	4.60	28.7	47.1
150.0	31	356%	0.00	6.63	4.60	28.3	46.5
160.0	67	320%	0.00	6.63	4.60	26.9	44.4
170.0	92	295%	0.00	6.63	4.60	25.8	43.0
180.0	73	314%	0.00	6.63	4.60	26.6	44.0
190.0	71	316%	0.00	6.63	4.60	26.7	44.2
200.0	90	297%	0.00	6.63	4.60	25.9	43.0
205.0	118	269%	0.00	6.63	4.60	24.7	41.4
210.0	153	234%	0.00	6.63	4.60	23.1	39.1

Asociacion Puertorriquena del Este de los Adventistas del Septimo Dia  
Luquillo, Puerto Rico

Table 1 (Cont.)

Bear Deg True	AE Meters	HAAT Meters	Ant Gain dB	ERP dBk	ERP kW	Distances to Contours (km)	
						70. dBu	60. dBu
215.0	223	164%	0.00	6.63	4.60	19.6	33.4
220.0	334	53%	0.00	6.63	4.60	11.1	19.9
225.0	449	-62%#	0.00	6.63	4.60	8.4	14.8
230.0	479	-92%#	0.00	6.63	4.60	8.4	14.8
240.0	545	-158%#	0.00	6.63	4.60	8.4	14.8
245.0	534	-147%#	0.00	6.63	4.60	8.4	14.8
250.0	529	-142%#	0.00	6.63	4.60	8.4	14.8
255.0	489	-102%#	0.00	6.63	4.60	8.4	14.8
260.0	453	-66%#	0.00	6.63	4.60	8.4	14.8
265.0	355	32%	0.00	6.63	4.60	8.5	15.1
270.0	233	154%	0.00	6.63	4.60	19.0	32.3
275.0	147	240%	0.00	6.63	4.60	23.4	39.6
280.0	96	291%	0.00	6.63	4.60	25.7	42.7
290.0	39	348%	0.00	6.63	4.60	28.0	46.0
300.0	37	350%	0.00	6.63	4.60	28.1	46.2
310.0	16	371%	0.00	6.63	4.60	29.0	47.4
315.0	12	375%	0.00	6.63	4.60	29.1	47.6
320.0	11	376%	0.00	6.63	4.60	29.1	47.6
330.0	2	385%	0.00	6.63	4.60	29.4	48.1
340.0	1	386%	0.00	6.63	4.60	29.5	48.2
350.0	1	386%	0.00	6.63	4.60	29.5	48.2
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	0	387					

## Notes:

% Not Included in Average Elevation

# Evaluated for a HAAT of 30.5 meters



Asociacion Puertorriquena del Este de los Adventistas del Septimo Dia  
Luquillo, Puerto Rico

AFFIDAVIT

COUNTY OF FAIRFAX )  
 ) SS:  
COMMONWEALTH OF VIRGINIA )

JOHN C. KEAN, being duly sworn upon oath deposes and says:

That he is employed as a Senior Engineer by the firm of Moffet, Larson & Johnson, Inc., consulting telecommunications engineers;

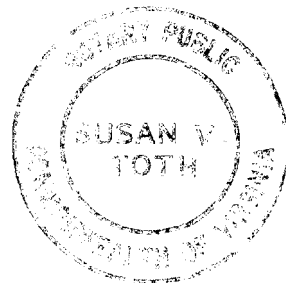
That this firm has been retained by Asociacion Puertorriquena del Este de los Adventistas del Septimo Dia to prepare this engineering statement;

That he has either prepared or directly supervised the preparation of all technical information contained in this engineering statement; and that the facts stated in this engineering statement are true of his knowledge, except as to such statements as are herein stated to be on information and belief, and as to such statements he believes them to be true.

John C. Kean  
John C. Kean

Subscribed and sworn to before me this 12th day of March, 1993.

Susan V. Voth  
Notary Public



My Comm. Expires  
July 31, 1965

Asociacion Puertorriquena del Este de los Adventistas del Septimo Dia  
Luquillo, Puerto Rico

A F F I D A V I T

COUNTY OF FAIRFAX )  
 ) SS:  
COMMONWEALTH OF VIRGINIA )


CHARLES G. PERRY III, being duly sworn upon oath deposes and says:

That he has a Bachelor's degree in Electrical Engineering from the University of Tennessee and that he is a registered professional engineer in the State of Virginia;

That he is employed as a Senior Engineer by the firm of Moffet, Larson & Johnson, Inc., consulting telecommunications engineers;

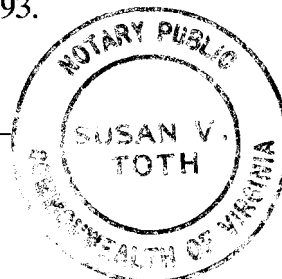
That this firm has been retained by Asociacion Puertorriquena del Este de los Adventistas del Septimo Dia to prepare this engineering statement;

That he has either prepared or directly supervised the preparation of all technical information contained in this engineering statement; and that the facts stated in this engineering statement are true of his knowledge, except as to such statements as are herein stated to be on information and belief, and as to such statements he believes them to be true.

  
Charles G. Perry, III

Subscribed and sworn to before me this 12th day of March, 1993.

Susan V. Woot  
Notary Public



My Comm. Exps.  
July 31, 1935

## **APPENDIX B**



5203 Leesburg Pike  
Falls Church, Virginia 22041

A F F I D A V I T

That he has either prepared or directly supervised the preparation of all technical information contained in this engineering statement; and that the facts stated in this engineering statement are true of his knowledge, except as to such statements as are herein stated to be on information and belief, and as to such statements he believes them to be true.

CERTIFICATE OF SERVICE

I, Donald E. Martin, hereby certify this 6th day of April, 1993 that I have caused a copy of the foregoing document to be sent to each of the following named persons by United States mail with first class postage prepaid:

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